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7 BEFORE THE INSURANCE COMMISSIONER
8 OF THE STATE OF WASHINGTON

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10 In the Matter of the Application regarding
11 the Conversion and Acquisition of Control of
12 Premera Blue Cross and its Affiliates

NO. G02-45

HOSPITAL ASSOCIATIONS' JOINDER
IN ALASKA INTERVENOR'S
ERRATA FILING

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15 Intervenor have asked the Commissioner to modify the proposed protective order
16 recommended by the Special Master in certain respects, including to clarify that the
17 definition of "parties counsel" in ¶ 1(d), includes support staff for all parties counsel,
18 regardless of whether those lawyers work in a private law firm, government agency, legal
19 services office, or in-house. The Alaska intervenors have pointed out that this request can
20 itself be read as ambiguous, in that it failed to list all of the entities employing "parties
21 counsel." For the sake of clarity, the Hospital Associations join in the Alaska
22 intervenors' submission, and add that the proposed order should be modified to make clear
23 that support staff for all parties' counsel, including the Hospital Associations, are permitted
24 to handle protected documents.
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1 Respectfully submitted this 20 day of May 2003.

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3 By 

4 Taya Briley, WSBA #30455
5 Director, Legal Services and Health
6 Policy
7 Association of Washington Public
8 Hospitals District
9 300 Elliott Avenue West, Suite 300
10 Seattle, WA 98119

11 BENNETT BIGELOW & LEEDOM, P.S.

12 By 

13 Michael Madden, WSBA #8747
14 Attorney at Law
15 999 Third Avenue, Ste. 2150
16 Seattle, WA 98104

17 Attorneys for Intervenors WSHA and
18 AWPHD
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20
21
22
23
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SERVICE LIST

(Via E-mail & U.S. Mail) Carol Sureau Deputy Insurance Commissioner Office of the Insurance Commissioner 5000 Capitol Blvd. Tumwater, WA 98501 Fax: (360) 586.3109 carols@oic.wa.gov	(Via Facsimile & U.S. Mail) John F. Hamje Legal Affairs Division Office of the Insurance Commissioner 5000 Capitol Blvd. Tumwater, WA 98501 Fax: (360) 586.3109
(Via Facsimile & U.S. Mail) James Odiorne Deputy Commissioner Office of the Insurance Commissioner PO Box 40259 Olympia, WA 98504-0259 Fax: (360) 586.3109	(Via Facsimile & U.S. Mail) Jeff Coopersmith Coopersmith & Associates, Inc. 701 Fifth Avenue, Ste. 4200 Seattle, WA 98104 Fax: (206) 262.8001
(Via Facsimile & U.S. Mail) Taya Briley Assoc. of WA Public Hospitals District 300 Elliot Avenue West, Suite 300 Seattle, WA 98119 Fax: (206) 283.6122	(Via Facsimile & U.S. Mail) James J. Davis Amy McCullough Alaska Legal Services Corporation 6220 Far Point Drive Anchorage, AK 99507 Fax: (907) 279.7417
(Via Facsimile & U.S. Mail) Daniel S. Gross Deborah A. Dorfman David B. Girard WA Protection & Advocacy System 180 West Dyton, Ste 102 Edmonds, WA 98020 Fax: 425.776.0601	(Via Facsimile & U.S. Mail) Eleanor Hamburger John Midgley 101 Yesler Way, Ste. 300 Seattle, WA 98104 Fax: (206) 382.3386
(Via Facsimile & U.S. Mail) Greg Montgomery Miller Nash LLP 4400 Two Union Square 601 Union Street Seattle, WA 98101-2352 Fax: (206) 622.7485	(Via Facsimile & U.S. Mail) Karen Perdue Associate Vice President University of Alaska P.O. Box 5160 Fairbanks, AK 99775 Fax: (907) 474.5574

1		
2	(Via Facsimile & U.S. Mail) Dina L. Yunker Assistant Attorney General University of Washington Health Sciences & Medical Centers Section D303 Warren G. Magnuson Health Sciences Center Seattle, WA 98195-7255 Fax: (206) 685.0525	(Via Facsimile & U.S. Mail) Richard Spoonemore Sirianni & Young, et al. 701 5 th Avenue, Suite 3410 Seattle, WA 98104 Fax: (206) 223.0246
3		
4	(Via Facsimile & U.S. Mail) Kirk A. Dublin Carol S. Arnold Thomas Kelly Preston Gates & Ellis LLP 701 Fifth Avenue, Ste. 5000 Seattle, WA 98104 (206) 623.7022	(Via Facsimile & U.S. Mail) John P. Domeika Senior Vice President General Counsel Premera Blue Cross PO Box 327, M 316 Seattle, WA 98111 Fax: (425) 670.5787
5		
6	(Via Facsimile & U.S. Mail) Melanie C. DeLeon Assistant Attorney General Office of the Attorney General 1125 Washington Street SE Olympia, WA 98504-0100 Fax: 360.664.0229 Ph.: 360.664.0083	
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